

July 30, 2015

TO: Department of the Army - Joint Base Lewis McChord, Washington  
FROM: David E. Ortman, Attorney-at-Law, 7043 22nd Ave N.W., Seattle, WA  
98117

RE: Comments on Scoping Document - JBLM Off-base Helicopter Training  
Areas

I want to express my strongest opposition to the proposed establishment of off-base helicopter training areas anywhere near any existing National Wilderness Areas, the Pacific Crest Trail, or other established National Forest trails. According to the JBLM Scoping Document, "Training operations would be conducted using aircraft to include the MH/UH-60 Black Hawk, AH-64 Apache, and MH/CH-47 Chinook. The training areas would be available for use day and night, 24 hours a day, 365 days a year, with the exception of Federal holidays."

While the Department of Army would save considerable money by eliminating unacceptable sites, if the Department of Army retains the existing proposed sites, the Department of Army must comply with NEPA, including the preparation of a full draft and final Environmental Impact Statement, including a full range of alternatives.

Impacts that must be considered as part of any EIS include:

- noise impacts
- localized impacts from land clearing
- air and water pollution
- toxic releases from fuel spills and accidents -impacts to fish and wildlife
- impacts to Wilderness values, including solitude
- impacts from accidents along the route to and from proposed training areas

There are no mitigation measures that would allow the Department of Army to issued a Finding of No Significant Impact.

In addition, it is clear that the current JBLM location continues to have unacceptable and adverse environmental and human impacts to the surrounding Pierce County area. The Department of Army should give strong consideration to relocating Fort Lewis to Yakima. This would allow the Department of Army to take advantage of the Yakima Firing Center and reducing energy and fuel requirements caused by traffic congestion moving equipment between the Tacoma area and Yakima. At the same time the Air Force should give strong

consideration to relocating McChord AFB to Moses Lake, which has an extremely underused airport and lengthy runway. This would help inject economic investment in Central/Eastern Washington, while freeing up JBLM for eventual relocation of Sea-Tac Airport, which can not accommodate the projected doubling of passengers at its current site. By relocating JBLM to the Yakima/Moses Lake area, JBLM could continue to coordinate training missions.

Please send me any NEPA threshold determination and Draft EIS issued on this misguided and controversial helicopter training area proposal.

Thank you.